

Exemplar Deficiencies Identified to Uber on January 21, 2024 and Discussed During Meet Confer on January 24, 2024

Bates/Control #	Type	Date Produced	Deficiencies
UBER_JCCP_MDL_000000659	Email	8/19/2024	(1) Uber has not produced the original, lowest-level email from Andi Pimentel sent on April 8, 2015 at 7:09 PM, even though Pimentel is a custodian. (2) Uber should have produced LinkedGoogleDocumentIDs metadata and either LinkBegBates or MissingGoogleDriveAttachments for all emails in the thread that include this reference to the hyperlink, regardless of whether the emails are the original email to contain the link.
UBER_JCCP_MDL_000005842	Document	8/19/2024	This Word document includes multiple links, for example to "an internal Sexual Assault & Domestic Violence corporate policy" on page 2 and numerous links on pages 5-6. There is no way to determine from the document production whether these documents have been produced and Uber refuses to produce metadata about these links.
UBER_JCCP_MDL_000010815 *Attached as Exhibit D	Email	8/19/2024	(1) Uber did not provide any hyperlink-related metadata for this email. Uber should have produced LinkGoogleDriveDocumentIDs metadata and either LinkBegBates or MissingGoogleDriveAttachments for all emails in the thread that include this reference to the hyperlink, regardless of whether they are the original email to contain the link. (2) although the Uber produced the lower-thread emails, Uber did so without complete metadata, omitting the LINKBEGBATES. Without the LINKBEGBATES metadata, Plaintiffs cannot identify whether Uber produced the document referenced at the link.

Exemplar Deficiencies Identified to Uber on January 21, 2024 and Discussed During Meet Confer on January 24, 2024

Bates/Control #	Type	Date Produced	Deficiencies
UBER_JCCP_MDL_000011387 (identified to Uber on 1/21); underlying email produced as UBER_JCCP_MDL_000224112 is attached hereto as Exhibit C.	Email	8/19/2024	<p>(1) Uber did not provide any hyperlink-related metadata for this email.</p> <p>(2) although the Uber produced the lower-thread emails, it did so without complete metadata. For example, the earliest email in this thread (which was produced as UBER_JCCP_MDL_000224112) contains 7 links but the metadata with that email includes only 6 LINKGOOGLEDRIVEDOCUMENTIDS, meaning Uber has not provided the Google Drive Document IDs for 1 of these links even though they appear to be Drive documents.</p> <p>(3) Additionally, Uber has provided LINKBEGBATES metadata for only one of the links. Without the LINKBEGBATES metadata, Plaintiffs cannot identify whether Uber produced the documents referenced at the links.</p> <p>(4) Uber has not identified missing Google links in the MissingGoogleDriveAttachments field.</p>
UBER_JCCP_MDL_000032212	Document	8/19/2024	<p>This is a Microsoft Word document. There is a link on the final page that says "See Google Doc". Uber has not provided any metadata that allows Plaintiffs to determine whether the document at the link has been produced and refuses to do so. Uber is required to produce metadata to identify this link.</p>
UBER_JCCP_MDL_000044263	Presentation	8/19/2024	<p>This is a PowerPoint presentation about a Safety Team pilot intervention program that "aims to prevent safety incidents by composing and sending unique safety tips and messages based on [user] risk profile," which contains numerous links to documents necessary to understand the presentation, for example, a project brief and a dashboard that "tracks all performance metrics and messages".</p> <p>Uber has not claimed that they do not have the documents at these links or that the documents at the links are nonresponsive. Uber is required to produce metadata to identify these links.</p>

Exemplar Deficiencies Identified to Uber on January 21, 2024 and Discussed During Meet Confer on January 24, 2024

Bates/Control #	Type	Date Produced	Deficiencies
UBER_JCCP_MDL_000046654 * Attached as Exhibit E	Email	8/19/2024	(1) Uber has not produced the original, lowest-level email from Rachel Whetstone, sent on March 6, 2016 at 5:59 nor her March 6 9:01 email, even though Whetstone is a custodian and these emails are responsive. (2) The 5:59 email links to "another Medium Post (Google Docs version here) but Uber has not provided metadata that allows Plaintiffs to determine whether Uber has produced the linked Google Doc.
UBER_JCCP_MDL_000046698 * Attached as Exhibit F	Email	8/19/2024	(1) Uber has not produced the original, lowest-level email from Rachel Whetstone, sent on December 6, 2015 at 10:18, even though Whetstone is a custodian and this email is responsive. (2) The 10:18 email links to "CommsPlan." Uber has not provided metadata that allows Plaintiffs to determine whether Uber has produced the linked Google Doc.
UBER_JCCP_MDL_000119412	Presentation	8/19/2024	This PowerPoint presentation includes at least 9 Google Drive links. Uber refuses to produce metadata that allows Plaintiffs to determine whether any of these Google Drive documents have been produced and is required to produce metadata to identify the links.
UBER_JCCP_MDL_000149960 * Attached as Exhibit B	Spreadsheet	8/19/2024	This is an Excel spreadsheet that contains a checklist of rules for working with third parties related to handling safety incidents. The spreadsheet contains links to reference documents titled "Incident Investigation and Reporting," "Investigation Guidelines," and "Incident Classification Guidelines" (among other links). Metadata that is available because this document is a spreadsheet (as opposed to Uber providing hyperlink metadata required by the ESI Order) indicates that the links go to Google documents. Uber refuses to produce metadata that would allow Plaintiffs to determine whether Uber has produced the link documents.

Exemplar Deficiencies Identified to Uber on January 21, 2024 and Discussed During Meet Confer on January 24, 2024

Bates/Control #	Type	Date Produced	Deficiencies
UBER_JCCP_MDL_000157044	Document	8/19/2024	This is a Word document entitled Uber Policy Positions 2019 and contains more than 100 links, including to thinks like, "As a testament to our commitment to combat the issue of sexual violence, Uber launched its Driving Change program" and "Transparency Report Talking Points Master Doc." Uber produced this document without any hyperlink metadata, as though it does not contain any links, and refuses to produce metadata that would allow Plaintiffs to identify the links.
UBER_JCCP_MDL_000170323	Email	8/19/2024	This email about women's safety includes multiple hyperlinks at various points through the thread, but Uber has not produced any corresponding hyperlink metadata with this email. Additionally, although Uber produced one of the earlier in thread emails that contains at least 5 hyperlinks that appear to be links to Google Drive documents, Uber produced LINKEDGOOGLEDRIVEDOCUMENTIDS for only two of those links and did not produce LINKBEGBATES for any.
UBER_JCCP_MDL_000253255	Document	8/30/2024	This is a Word document drafted by Tracey Breeden (a custodian) that contains a link: "my team has been working diligently on eradicating sexual assault from our external platform since Q4 (background linked here)." Uber refuses to produce metadata for this link.
UBER_JCCP_MDL_000325764	Email	8/30/2024	This is an email thread that includes multiple links in lower-thread emails. Although Uber claims to have produced the linked documents along with one of the lower thread emails (produced at UBER_JCCP_MDL_000325771), (1) the metadata for this document (UBER_JCCP_MDL_000325764) does not allow for that connection and (2) the metadata for the lower-thread email likewise does not provide information to identify the linked documents in the production (no LINKEDGOOGLEDRIVEDOCUMENTIDS or LINKBEGBATES provided).

Exemplar Deficiencies Identified to Uber on January 21, 2024 and Discussed During Meet Confer on January 24, 2024

Bates/Control #	Type	Date Produced	Deficiencies
UBER_JCCP_MDL_000868324	Spreadsheet	10/15/2024	This is an Excel spreadsheet titled "Non-Compliant Metrics Workbook" which addresses background check issues and contains numerous "uberinternal.com" links and other links just titled "link" which appear to be to Google documents. Uber refuses to provide any metadata about these links.
UBER_JCCP_MDL_001731878	Document	12/20/2024	This is a Word document titled "2017 SAFE RIDES FEE SETTLEMENT AGREEMENT PROPOSED COMMS PLAN" and contains links including, "Support Macros are contained in the doc here," and "Embargo lifts at 2 PM PT and we will likely post this blog to also help ensure reporters have the facts," among many other links. Uber refuses to produce metadata about these links.